

& KELLOGG SOVEREIGN

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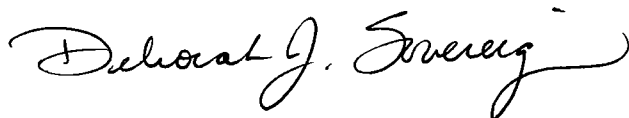
April 15, 2005

Federal Communications Commission
Office of the Secretary
9300 East Hampton Drive
Capitol Heights, MD 20743

Dear Federal Communications Commission:

Please find the enclosed Petition for Review filed on behalf of Southern Oklahoma
Technology Center.

Respectfully submitted,



Deborah J. Sovereign

Enclosures

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of

Request for Review by Southern
Oklahoma Technology Center of
Administrator's Decisions on Appeal
dated February 23, 2005 and March 18,
2005.

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)
)
)

CC Docket No. 02-6

To The Commission

PETITION FOR REVIEW

**SOUTHERN OKLAHOMA
TECHNOLOGY CENTER**

April 15, 2005

Deborah Sovereign
Jane Kellogg

Kellogg & Sovereign Consulting, LLC
26575 Hwy 1E
Allen, OK 74825
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I. SUMMARY

Southern Oklahoma Technology Center (“SOTC”) hereby requests that the Commission review the attached two separate Administrator’s Decisions on Appeal of the Universal Service Administrative Company (“USAC”) dated February 23, 2005 (Attachment i) and March 18, 2005 (Attachment ii) for the following:

Applicant Name: Southern Oklahoma Technology Center
Billed Entity Number: 139846

Form 471 Application Number: 387740
Funding Request Numbers: 1149112, 1149115, 1149124, 1149126, 1149129, 1149138, 1149141, 1149145, 1149150, 1149158, and 1149164

Form 471 Application Number: 387741
Funding Request Numbers: 1153748, 1153754, 1153768, 1153771, 1153776, 1153789, 1153802, 1153816, 1153826, 1153831, 1153840

The appeal on both applications was for the same situation. We are therefore filing one request for review for both of the USAC Administrator’s appeal decisions.

The Administrator’s decision on appeal: Denied

We are requesting that the Commission review the decision as we believe the Administrator’s decision was based on upholding guidelines that are not in accordance with FCC rules. The applicant made a data entry error when entering the number of students eligible for the national school lunch program (“NSLP students”) on Block 4 of the Form 471. Block 4, Item 5 was incorrectly keyed as 198 and should have been keyed as 233. This data entry error resulted in the on-line Form 471 program calculating the discount rate to be 80% instead of 90%. The pre-discount amounts on the Form 471 were NOT changed. Since the applicant has documentation to support the 90% discount with the NSLP students correctly entered, we submitted a data entry correction to the NSLP

students shown on Block 4 of the Form 471 within the prescribed 3 week time period. Since the data entry correction was made in a timely manner, we believe the applicant's Form 471 should be considered for funding at the 90% discount level as corrected. The 90% discount change does NOT change the pre-discount amount that was originally requested. Additionally, we cited Paragraph 27 of the Federal Communications Commission Fifth Report and Order (See *Schools and Libraries Universal Service Support Mechanism*, CC Docket No. 02-6, Fifth Report and Order, FCC 04-190, released 8/13/2004. Hereinafter referred to as "Fifth Report and Order.") that states "...For instance, in a situation in which the beneficiary made a clerical error in calculating the level of participation in the school lunch program, ... the beneficiary may legitimately receive support under a recalculated discount rate." (See Attachment D)

II. BACKGROUND

We have attached the original Appeal and attachments for review. (See Attachment iii).

III. ARGUMENT

The Administrator listed the first reason for denial that "SLD does not have the authority to change these established guidelines." We have worked with the E-Rate program since its inception in 1997 and have hundreds of examples of changes in SLD guidelines throughout the years. Many of the changes to SLD guidelines came as a result of clarifications by the Commission to the Administrator in regards to the intent of the FCC rules.

We could not find any specific reference in prior FCC rules that discusses the situation prescribed in the Receipt Acknowledgement Letter (“RAL”) instructions that stated:

“Note: If a Block 4 correction will lead to a decrease in the original discount percentage requested, the correction will be processed. This revised calculation will become the new discount percentage for the worksheet and for any Block 5 Funding Requests that reference the worksheet. If a Block 4 correction would lead to an increase in the discount percentage requested, the original discount percentage will continue to be the discount percentage for the worksheet and for any Block 5 Funding Requests that reference the worksheet.” (See Attachment A-2 of the original Appeal).

In fact, the only discussion in the FCC Reports and Orders for CC Docket 02-6 related to this particular issue was the discussion in the Fifth Report and Order that we referenced earlier that stated , “...the beneficiary may legitimately receive support under a recalculated discount rate.”

In Attachment E of the original appeal, we included copies of the statements from the Fifth Report and Order of Commissioner Michael J. Copps and Commissioner Jonathan S. Adelstein. Commissioner Copps stated, “So we must always keep the beneficiaries in mind as we work to resolve problems in the program.” Commissioner Adelstein further stated, “We are working to ... simplify and clarify the application process, so that we don’t set up unnecessary obstacles for deserving applications.” This particular guideline regarding Block 4 changes on the Receipt Acknowledgement Letter referenced above encourages abuse of the program as an applicant is actually better off if they request a higher discount rate on the original application. Since program integrity assurance (PIA) reviewers will check the discount rate during review and will lower the discount rate but won’t increase the discount rate, it would behoove applicants to request a higher discount rate then take care of documenting the rate at a later date. If an

applicant inflates their discount rate on the original Form 471 application, there is no penalty if during review the supporting documentation warrants a decrease in the discount rate. If, however, an applicant's discount rate should be higher than originally requested, the applicant has now been unfairly penalized since the current SLD procedures do not allow the applicant to receive support under the recalculated higher discount rate. It is our understanding that is why the Fifth Report and Order stated that as long as the applicant has the documentation to support the discount, then "the beneficiary may legitimately receive support under a recalculated discount rate."

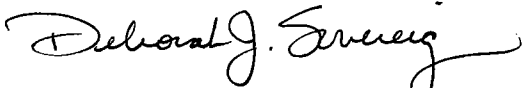
The second reason for denial listed by the Administrator is that the applicant "requests additional funds that were not included in the Form 471 that you are appealing." The funding requests on both applications were not changed. The only change was to correct the number of NSLP students on Block 4 of the Form 471 which resulted in an increase in the discount rate from 80 to 90%. No additional funding requests were made on the Receipt Acknowledgement Letter.

IV. CONCLUSION

We therefore request that the Commission review the Administrator's Decisions dated February 23, 2005 and March 18, 2005 regarding the Appeal that was originally filed August 26, 2004 for Southern Oklahoma Technology Center, Billed Entity Number 139846. The original Appeal requested approval of the data entry corrections on the Receipt Acknowledgement Letters ("RALs") for Form 471 application # 387741 and 387740. The RAL data entry correction was to change Block 4, Item 5 (# of NSLP students) as originally submitted from 198 students to the correct number of 233 NSLP

students which would result in a 90% discount on all funding requests on both applications.

Respectfully Submitted,



Deborah J. Sovereign, Consultant

ATTACHMENTS

- i. Administrator's Decision on Appeal –Form 471 Application # 387741 (dated February 23, 2005)
- ii. Administrator's Decision on Appeal-Form 471 Application # 387740 (dated March 18, 2005)
- iii. Letter of Appeal filed August 26, 2004
 - A. Receipt Acknowledgement Letter – instructions for reporting Block 4 corrections
 - B. Supporting Documentation for 90% Discount Rate
 - C. Corrected Receipt Acknowledgement Letters submitted to SLD on March 2, 2004
 - D. Excerpt from FCC Fifth Report and Order (FCC 04-190)
 - E. Commissioner Statements – FCC Fifth Report and Order
 - F. Funding Commitment Decision Letter – Form 471 Application #387740
 - G. Listing of Funding Request Numbers Affected
 - H. Letter of Agency

ATTACHMENT i

Administrator's Decision on Appeal
Form 471 App# 387741



Universal Service Administrative Company
Schools & Libraries Division

Administrator's Decision on Appeal – Funding Year 2004-2005

February 23, 2005

Debi Sovereign
Kellogg & Sovereign Consulting LLC
P.O. Box 130
Allen, OK 74825

Re: Applicant Name: SOUTHERN OKLAHOMA TECHNOLOGY
CENTER
Billed Entity Number: 139846
Form 471 Application Number: 387741
Funding Request Number(s): 1153748, 1153754, 1153768, 1153771, 1153776,
1153789, 1153802, 1153816, 1153826, 1153831,
1153840
Your Correspondence Dated: August 26, 2004

After thorough review and investigation of all relevant facts, the Schools and Libraries Division (SLD) of the Universal Service Administrative Company (USAC) has made its decision in regard to your appeal of SLD's Funding Year 2004 Funding Commitment Decision Letter for the Application Number indicated above. This letter explains the basis of SLD's decision. The date of this letter begins the 60-day time period for appealing this decision to the Federal Communications Commission (FCC). If your Letter of Appeal included more than one Application Number, please note that you will receive a separate letter for each application.

Funding Request Number(s): 1153748, 1153754, 1153768, 1153771, 1153776,
1153789, 1153802, 1153816, 1153826, 1153831,
1153840

Decision on Appeal: **Denied**
Explanation:

- On appeal, you are requesting that SLD allow the Block 4 data entry correction that would raise Southern Oklahoma Technology Center's requested discount from 80% to 90%. In support of your appeal, you state that SLD and the FCC have developed procedures that allow for Block 4 data entry corrections that lead to a decrease in the original discount percentage, but do not allow such corrections if the discount rate would increase. You disagree with these guidelines, and believe that according to FCC rules and the intent of the FCC, as

long as the higher requested discount can be supported, there is no reason not to provide data entry corrections for increases as well as decreases. The correct number of NSLP students for the school was 233. The data entry clerk entered 198 students in error, resulting in a loss of \$32,783 in funding. The error was caught within the three week RAL correction period and the school followed the procedure for submitting those changes. The school has clear documentation to support the 90% discount rate. You have also cited the FCC Fifth Report and Order(FCC 04-190) referencing a discussion of rules violations that mentions a case of a clerical error on the discount rate calculation, stating that the beneficiary may legitimately receive support under a recalculated discount rate.

- Upon review of the information submitted during the initial review period and the additional information submitted on appeal, we find that you submitted a RAL request to change the information in Block 4 because a data entry error occurred. The RAL change was denied, as SLD guidelines prohibit changes to an application that will result in an increase in funding. You acknowledge that you were aware of this rule, quoting the instructions on the RAL letter pertaining to changes which increase the discount percentage requested. SLD does not have the authority to change these established guidelines.
- Your appeal requests additional funds that were not included in the Form 471 that you are appealing. FCC rules require that funding requests be made on a Form 471. 47 C.F.R. § 54.504(c). Funding requests may not be made on appeals of SLD funding commitment decisions. Whether your request can be considered for funding will depend on the date your Form 471 is received and whether funds are available if it is received after the close of the filing window. 47 C.F.R. § 54.507(g). Consequently, SLD denies your appeal insofar as it requests funding not requested in the Form 471, which forms the basis of this appeal.

If your appeal has been approved, but funding has been reduced or denied, you may appeal these decisions to either the SLD or the FCC. For appeals that have been denied in full, partially approved, dismissed, or cancelled, you may file an appeal with the FCC. You should refer to CC Docket No. 02-6 on the first page of your appeal to the FCC. Your appeal must be received or postmarked within 60 days of the date on this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. If you are submitting your appeal via United States Postal Service, send to: FCC, Office of the Secretary, 445 12th Street SW, Washington, DC 20554. Further information and options for filing an appeal directly with the FCC can be found in the "Appeals Procedure" posted in the Reference Area of the SLD web site or by contacting the Client Service Bureau. We strongly recommend that you use the electronic filing options.

We thank you for your continued support, patience and cooperation during the appeal process.

Schools and Libraries Division
Universal Service Administrative Company

cc: Debi Sovereign or Jane Kellogg

ATTACHMENT ii

Administrator's Decision on Appeal
Form 471 App# 387740



Universal Service Administrative Company
Schools & Libraries Division

Administrator's Decision on Appeal – Funding Year 2004-2005

March 18, 2005

Debi Sovereign
Kellogg and Sovereign Consulting
P.O. Box 130
Allen, OK 47825

Re: Applicant Name: SOUTHERN OKLAHOMA TECHNOLOGY
CENTER
Billed Entity Number: 139846
Form 471 Application Number: 387740
Funding Request Number(s): 1149112, 1149115, 1149124, 1149126, 1149129,
1149138, 1149141, 1149145, 1149150, 1149158,
1149164
Your Correspondence Dated: August 26, 2004

After thorough review and investigation of all relevant facts, the Schools and Libraries Division (SLD) of the Universal Service Administrative Company (USAC) has made its decision in regard to your appeal of SLD's Funding Year 2004 Funding Commitment Decision Letter for the Application Number indicated above. This letter explains the basis of SLD's decision. The date of this letter begins the 60-day time period for appealing this decision to the Federal Communications Commission (FCC). If your Letter of Appeal included more than one Application Number, please note that you will receive a separate letter for each application.

Funding Request Number(s): 1149112, 1149115, 1149124, 1149126, 1149129,
1149138, 1149141, 1149145, 1149150, 1149158,
1149164

Decision on Appeal: **Denied**
Explanation:

- On appeal you are requesting that SLD allow a Block 4 data entry correction that would raise your requested discount from 80% to 90%. In support of your appeal, you state that SLD and the FCC have developed procedures that allow for Block 4 data entry corrections that lead to a decrease in the original discount percentage, but do not allow such corrections if the discount rate would increase. You disagree with these guidelines, and believe that according to FCC rules and the intent of the FCC, as long as the higher requested discount can be supported, there

is no reason not to provide data entry corrections for increases as well as decreases. The correct number of NSLP students for the school was 233. The data entry clerk entered 198 students in error, resulting in a loss of \$32,783 in funding. The error was caught within the three week RAL correction period and the school followed the procedure for submitting those changes. The school has clear documentation to support the 90% discount rate. You have also cited the FCC Fifth Report and Order(FCC 04-190) referencing a discussion of rules violations that mentions a case of a clerical error on the discount rate calculation, stating that the beneficiary may legitimately receive support under a recalculated discount rate.

- Upon review of the information submitted during the initial review period and the additional information submitted on appeal, we find that you submitted a RAL request to change the information in Block 4 because a data entry error occurred. The RAL change was denied, as SLD guidelines prohibit changes to an application that will result in an increase in funding. You acknowledge that you were aware of this rule, quoting the instructions on the RAL letter pertaining to changes which increase the discount percentage requested. SLD does not have the authority to change these established guidelines.
- Your appeal requests additional funds that were not included in the Form 471 that you are appealing. FCC rules require that funding requests be made on a Form 471. 47 C.F.R. § 54.504(c). Funding requests may not be made on appeals of SLD funding commitment decisions. Whether your request can be considered for funding will depend on the date your Form 471 is received and whether funds are available if it is received after the close of the filing window. 47 C.F.R. § 54.507(g). Consequently, SLD denies your appeal insofar as it requests funding not requested in the Form 471, which forms the basis of this appeal.

If your appeal has been approved, but funding has been reduced or denied, you may appeal these decisions to either the SLD or the FCC. For appeals that have been denied in full, partially approved, dismissed, or cancelled, you may file an appeal with the FCC. You should refer to CC Docket No. 02-6 on the first page of your appeal to the FCC. Your appeal must be received or postmarked within 60 days of the date on this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. If you are submitting your appeal via United States Postal Service, send to: FCC, Office of the Secretary, 445 12th Street SW, Washington, DC 20554. Further information and options for filing an appeal directly with the FCC can be found in the "Appeals Procedure" posted in the Reference Area of the SLD web site or by contacting the Client Service Bureau. We strongly recommend that you use the electronic filing options.

We thank you for your continued support, patience and cooperation during the appeal process.

Schools and Libraries Division
Universal Service Administrative Company

cc: Debi Sovereign Or Jane Kellogg

ATTACHMENT iii

Originally Filed
Letter of Appeal

Dated August 26, 2004

August 26, 2004

LETTER OF APPEAL

Contact:

Debi Sovereign
Kellogg & Sovereign Consulting, LLC
P.O. Box 130
Allen, OK 74825
Phone: 580.332.1444
Fax: 580.332.2532
Email: dsovereign@kelloggllc.com

Applicant:

Southern Oklahoma Technology Center
Billed Entity Number 139846
Funding Year: 2004
Form 471 Applications 387740, 387741

Reason for Appeal:

We are appealing the discount rate approved on all funding requests included on Form 471 application # 387740. Additionally, we would also like this appeal to include all funding requests listed on Form 471 application # 387741 even though as of the date of this filing the funding commitment decision letter has not yet been issued for Form 471 application # 387741.

We are requesting that the discount rate be changed to 90% as was originally shown on the correction to the Receipt Acknowledgement Letters (See Attachment C).

Discussion:

In recognition that keying errors can occur, the SLD has developed program rules that allow for data entry corrections. SLD guidelines allow for corrections to Block 4 information (discount calculation) as long as the correction is made within 3 weeks of receipt of the Receipt Acknowledgement Letter (RAL). Instructions on the Receipt Acknowledgement Letter state, "If a Block 4 correction will lead to a decrease in the original discount percentage requested, the correction will be processed." However, "If a Block 4 correction would lead to an increase in the discount percentage requested, the original discount percentage will continue to be the discount percentage for the worksheet and for any Block 5 Funding Requests that reference the worksheet." (See Attachment A).

We disagree with the SLD guidelines regarding the correction to the discount rate if it results in a higher percentage for the applicant. We believe that according to Federal Communications Commission (FCC) rules and the intent of the FCC, that as long as the applicant can document their discount percentage, there should be no reason to provide a correction method for errors that reduce the discount percentage, but not provide for the same process for data entry errors that increase the discount percentage. In fact, providing only reduction relief creates a sense of unfairness and in turn encourages waste, fraud and abuse in the program which is certainly not the intent of the FCC.

In this particular case, the correct number of NSLP students (See Block 4, Worksheet A, Item 5) was 233 students. The data entry clerk keyed in 198 students. The keying error was 35 students which resulted in dropping the discount rate from 90% to 80%. The school has the proper documentation to show that correct number should be 233 students. (See Attachment B). The keying error resulted in a reduction of \$10,433 for Form 471 Application # 387740 and a reduction of \$32,783 for Form 471 Application # 387741. The total penalty to the school for not keying in the quantity correctly is \$43,216.

The school caught the error within the 3 week period of time for allowing corrections to the Receipt Acknowledgement Letter (RAL). The school followed the procedures for making corrections as indicated on the RAL and submitted the corrections to the SLD within the 3 week period (See Attachment C).

We do not believe it is the intent of the FCC to penalize the school for the clerical error since it was caught within the 3 week period of time, corrected using the RAL method, and the school has the proper documentation to support their discount rate.

Specifically, in Paragraph 27 of the Federal Communications Fifth Report and Order (FCC 04-190, released 8/13/2004, See Attachment D), the Commission states, "when applicants fail to calculate properly their appropriate discount rate, the amount disbursed in violation of this rule is the difference between the amount of support to which the beneficiary is legitimately allowed and the amount requested or provided. For instance, in a situation in which the beneficiary made a clerical error in calculating the level of participation in the school lunch program, ... the beneficiary may legitimately receive support under a recalculated discount rate [emphasis added]."

Even though the FCC discussion above was related to rule violations, it clearly states that in the case of a clerical error on the discount rate calculation, the applicant may legitimately receive support under a recalculated discount rate.

Furthermore, in the Statement of Commissioner Michael J. Copps in the Fifth Report and Order (page 46, FCC 04-190), Commissioner Copps stated "we must always keep the beneficiaries in mind as we work to resolve problems in the program." Commissioner Jonathan S. Adelstein's statement to the 5th Order included the comment, "we are working to safeguard against waste, fraud, and abuse, and, at the same time, to simplify and clarify the application process, so that we don't set up unnecessary obstacles for deserving applicants (page 48, FCC 04-190. See Attachment E.)

Conclusion:

We do not believe it is the intent of the FCC to provide relief for data entry corrections that are reductions but not provide for data entry corrections that are increases in discounts allowed for the beneficiaries. To provide relief only in cases of reduction in funding serves to undermine the program and sets up "unnecessary obstacles for deserving applicants." Additionally, since this particular case was clearly discussed in paragraph 27 of the Fifth Report and Order, and since the beneficiary has clear

documentation to support the 90% discount rate, we request that the discount rate be corrected to 90% on all funding requests in both Form 471 application # 387740 and Form 471 application # 387741 as originally shown on the corrected Receipt Acknowledgement Letters.

Respectfully submitted,



Debi Sovereign, Consultant

Attachments:

- A. Instructions on Receipt Acknowledgement Letter
- B. Supporting Documentation for 90% Discount Rate
- C. Corrected Receipt Acknowledgement Letters
- D. Excerpt from FCC Fifth Report and Order
- E. Commissioner Statements included in FCC Fifth Report and Order
- F. Funding Commitment Decision Letter for Form 471 App # 387740
- G. Listing of Applications and funding requests affected
- H. Letter of Agency

ATTACHMENT A

Receipt Acknowledgement Letter Instructions for Correcting Block 4 Errors



Universal Service Administrative Company
Schools & Libraries Division

FORM 471 RECEIPT ACKNOWLEDGMENT LETTER
(Funding Year 2004: 07/01/2004 - 06/30/2005)

February 12, 2004

Debi Sovereign or Jane Kellogg
SOUTHERN OKLAHOMA TECHNOLOGY CENTER
902 Arlington Cntr, #136
Ada, OK 74820-2883

Re: Form 471 Application Number: 387740
Funding Year 2004: 07/01/2004 - 06/30/2005
Applicant's Form Identifier: SOKTY7-1
Billed Entity Number: 139846

This notification is an acknowledgment of receipt and successful data entry of your FCC Form 471, "Services Ordered and Certification Form," reflecting \$104,326.14 in total program year pre-discount costs for services. This letter confirms that the Form 471 and signed or electronically certified Form 471 Certification have been received. Please note that the later of these Form 471 application materials was postmarked or received by the Schools and Libraries Division (SLD) on 02/04/2004. Your application will be considered within the Form 471 application filing window wherein all applications that meet the Minimum Processing Standards are treated as though they were received on the same day. It is important that you retain this Form 471 Receipt Acknowledgment Letter (RAL) for your records.

NOTE: Item 25 on the Form 471 is a certification that you have secured access to the resources necessary to pay for (1) the non-discount portion of the costs for eligible services within the funding year, as well as (2) the ineligible products and services to make effective use of the eligible services you have requested. "Secured access" means that you can show that these funds are, or will be, part of your annual budget; or, if you are obtaining the funds from an outside revenue source, that these funds have been acquired or committed. IF YOU OBTAIN THESE FUNDS FROM AN OUTSIDE SOURCE, THE FUNDS MUST NOT COME DIRECTLY OR INDIRECTLY FROM YOUR SERVICE PROVIDER(S). YOUR SERVICE PROVIDER(S) MAY NOT WAIVE THE NON-DISCOUNT PORTION OF THE COSTS.

THIS LETTER DOES NOT CONTAIN ANY DECISIONS CONCERNING YOUR REQUESTS FOR DISCOUNTS. NOTE, HOWEVER, THE THREE-WEEK RESPONSE DEADLINE DESCRIBED BELOW.

It is important that you keep the Form 471 Application Number cited above for future communications with the SLD. Our Program Integrity Assurance (PIA) Team will now review your application for compliance with program rules. Once the review of your application has been completed, you will receive one or more Funding Commitment Decision Letters (FCDLs) to inform you of our decisions on your Funding Requests. You cannot assume that USAC will approve the discounts for which you are applying before an FCDL is issued.

ALLOWABLE CORRECTIONS USING THE RAL (ACT WITHIN THREE WEEKS!)

- If you find data entry errors on this letter, or you previously identified errors on your Form 471, certain of these errors can be corrected using this Form 471 RAL.
- You MUST, at a minimum, include the signature, printed name and official title of either the contact person on this letter or the authorized person on the Form 471.
 - Requests must be received or postmarked within three weeks of the date on this letter.

If any of the required information is missing or the request is late, the request will not be processed, but will be included in the review of the form.

Examples of ALLOWABLE CORRECTIONS are:

A. CORRECTIONS TO BLOCK 1 INFORMATION: You may correct Block 1 items such as the applicant's e-mail address, contact person's name, street address, etc.

B. CORRECTIONS TO BLOCK 4 INFORMATION: While the RAL does not contain Block 4 Worksheet information, you may check this information on our web site. (See the last paragraph in this letter for instructions on displaying application data.) You may correct an entity listed on a Block 4 Worksheet. If needed, include an additional page from the appropriate Block 4 Worksheet - A, B or C - from a blank Form 471 with ALL columns completed. If the Form 471 has multiple worksheets, be sure to indicate the worksheet number(s) for which you are requesting the entity correction(s) be made. The Item 21 Attachment must substantiate corrections to Block 4. (See the FCC Order DA 02-90, released January 14, 2002.)

NOTE: If a Block 4 correction will lead to a decrease in the original discount percentage requested, the correction will be processed. This revised calculation will become the new discount percentage for the worksheet and for any Block 5 Funding Requests that reference the worksheet.

If a Block 4 correction would lead to an increase in the discount percentage requested, the original discount percentage will continue to be the discount percentage for the worksheet and for any Block 5 Funding Requests that reference the worksheet.

C. REDUCTIONS TO BLOCK 5 FUNDING REQUESTS: You may request reductions to Block 5 Funding Requests except for those that would increase your discount percentage due to a change in recipients of that Block 5 service. You may wish to reduce requests if you:

- will not be able to make use of services for which you requested Funding Year 2004 discounts, or
- based your Funding Year 2004 Funding Request(s) for tariffed or month-to-month service on a projected rate increase that is now known to be much smaller than expected.

D. CANCELLATIONS OF BLOCK 5 FUNDING REQUESTS: You may wish to request to cancel Block 5 Funding Requests if you:

- duplicated pending requests in Forms 471 where you had not received an FCDL before the close of the Form 471 application filing window, or
- will not be able to make use of services for which you requested Funding Year 2004 discounts.

Reduction and cancellation requests are not subject to the three-week deadline.

The SLD encourages applicants who know that they will not use all of the amounts requested to notify the SLD of an appropriate reduction to or cancellation of these Funding Requests. This action would allow the SLD to distribute the amounts that are available for the funding year more effectively.

E. UNBUNDLING AN FRN: You may request to "split" or "unbundle" an incorrectly combined Funding Request Number (FRN) with two or more services from different service providers (for example, local phone service from one company and long distance service from another for which you receive separate bills), or from different eligible service categories (such as Internal Connections and Internet Access).

NOTE: The total dollar amount represented by the newly divided FRNs must not exceed the amount you requested for the original combined FRN.

On the photocopy of your RAL, draw a line through the original bundled FRN. Then write in the SPIN, Service Provider Name, Services Ordered category, Total Program Year Pre-Discount \$ Amount, and Discount Percentage for each distinct service you have now "unbundled," making sure that the total dollars requested add up to no more than the ORIGINAL request.

F. CORRECTION OF AN INCORRECT SPIN (Service Provider Identification Number): Corrective SPIN Changes are allowed. These include corrections because

- there was a data entry error by the applicant or the SLD, or
- the company has merged with or been acquired by another company, or
- other instances when the SPIN indicated on the Form 471 changed when the applicant did not initiate such a change.

ATTACHMENT B

Block 4 – Supporting Documentation for 90% Discount Rate

Southern Oklahoma Technology Center

BLOCK 4, ATTACHMENT # 1-A

Income Survey Results:

Site	Total Enrollment	Surveys Received	% Received	# Eligible Free Red lunch	%	Prorated # Eligible	%
10-V020-900	302	257	85%	198	77%	233	77%
Total	302	257		198		233	

Surveys are kept on file at Southern Oklahoma Technology Center Administration Offices
2610 Sam Noble Parkway, Ardmore, Oklahoma 73401
See Block 4, Attachment 1-C for sample survey

Applies to both
App# 387740
and 387741

Entity # 139846 (S. OK Technology Cntr)
Form 471 Application #387740
Applicant's Form Identifier: SOKTY7-1
Contact Person: D Sovereign & J Kellogg
Email: erate@kelloggllc.com

ATTACHMENT # B-1

E-RATE INCOME SURVEY SUMMARY - SCHOOL YEAR 2003-2004

District: Southern OK Technology Center

Superintendent Signature: CR Bob Gragg, Ph.D.

Date: 10-15-03

Printed Name: C.R. Bob Gragg, Ph.D.

SCHOOL INFORMATION			
School Site Number	SITE NAME	Grade Span Low-High	(a) Site Enrollment (PK-12) *
900	SOTC - ARDMORE	9-12	302

SURVEY INFORMATION			
(b) # Surveys Sent / Rec'd	(c) #Students eligible for F/R lunches (PK-12)*	(d) # Students NOT eligible for F/R lunch (PK-12)*	(e) Total# Students Listed on Survey (PK-12)*
302 / 257	198	59	257

ATTACHMENT # B-2

Please mail or fax completed summary sheet AND a copy of ONE completed income survey to:

Debi Sovereign, Kellogg & Sovereign Consulting LLC
902 Arlington Center, PMB 136; Ada, OK 74820
Phone: 580-332-1444; Fax: 580-332-2532

RETURN NO LATER THAN NOVEMBER 30, 2003

*Include ALL students. Pre-K through 12th grade

Entity # 139846 (S. OK Technology Cntr)
Form 471 Application #387740
Applicant's Form Identifier: SOKTY7-1
Contact Person: D Sovereign & J Kellogg
Email: erate@kelloggllc.com

Confidential E-Rate Income Survey
2003-2004 School Year¹

The following table shows the income levels used by the E-rate program to determine discounts on technology services for our schools and libraries. Locate your household size on the table below. Please check the following:

☒ My household income is at or below the amount listed for our household size.
CIRCLE YOUR HOUSEHOLD SIZE AND INCOME LEVEL BELOW

☐ My household income is above the amount listed for our household size.
DO NOT CIRCLE ANYTHING IN THE TABLE.

Household Size (Adults & Children)	Est. Annual Income (As Reported to IRS)	Monthly Income	Weekly Income
1	\$16,613	\$1,385	\$320
2	22,422	1,869	432
3	28,231	2,353	543
4	34,040	2,837	655
5	39,849	3,321	767
6	45,658	3,805	879
7	51,467	4,289	990
8*	57,276	4,773	1,102

(* If more than 8 household members, add \$5,809 to the yearly income for each additional family member.)

Please list all students in your household that attend public school. (Enter the grade they will be entering in Fall, 2003)

Name	Grade	School
Amanda	11	Marietta

Please circle any of the following programs your family participates in:

- | | |
|----------------------------------|--|
| a. Medicaid | d. Federal Housing Assistance or Section 8 |
| b. Food Stamps | e. Low-Income Home Energy Assistance Program |
| c. Supplementary Security Income | |

I certify that the above information is, to the best of my knowledge, true and complete:

Signature: Marilyn Date: 6-30-03
Printed Name: Marilyn Phone: _____
Address: 73448 Marietta GA

¹ Income Eligibility Guidelines for Reduced Priced Meals. July 1, 2003-June 30, "TEGs.htm)

Entity # 139846 (S. OK Technology Cntr)
Form 471 Application #387740
Applicant's Form Identifier: SOKTY7-1
Contact Person: D Sovereign & J Kellogg
Email: erate@kelloggllc.com

ATTACHMENT # B-3




Phone (580) 223-2070 • Fax (580) 223-2120

2610 Sam Noble Pkwy. • Ardmore, OK 73401

Block 4 Certification.

I certify that only those students who meet the Income Eligibility Guidelines of the National School Lunch Program have been included in Column 5 of Item 10b, of Block 4 (Worksheet A) of the Form 471.

Signed:  Title: Information Technology Coordinator

Date: 8-26-04

SOTC

In District! Toll Free : 800-989-4599
www.sotc.org

ATTACHMENT # B-4

ATTACHMENT C

Corrected Receipt Acknowledgement Letters
Submitted to SLD
March 2, 2004

TRANSMISSION VERIFICATION REPORT

TIME : 02/29/2004 00:22
 NAME : KELLOGG & SOVEREIGN
 FAX : 5803322532
 TEL : 5803321444
 SER. # : BROM1J867089

DATE, TIME	02/29 00:19
FAX NO. /NAME	19735996526
DURATION	00:03:09
PAGE(S)	06
RESULT	OK
MODE	STANDARD
	ECM

KELLOGG & SOVEREIGN CONSULTING, LLC

902 Arlington Center, PMB 136
 Ada, OK 74820
 office: 580.332.1444
 fax: 580.332.2532
 email: dsovereign@kelloggllc.com

JUST THE FAX

Send to: Data Entry Corrections	SLD
Fax: 973-599-6526	Phone: 888-203-8100
From: Debi Sovereign	
Date: 3/2/04	No. Pages (incl. cover): 7 / 0
RE: Form 471 App #387740, BEN 139846, Southern Oklahoma Technology Center	

Please make the following correction as shown on the "marked up" Receipt Acknowledgement Letter for Southern Oklahoma Technology Center:

Block 4, Worksheet A No. 512870
 Item 5. NSLP Students should be 233 (not 198)

This will change discount percentage to 90% for the following FRNs:
 1149112, 1149115, 1149124, 1149126, 1149129, 1149138, 1149141, 1149145, 1149150,
 1149158, 1149164

Thank you,

ATTACHMENT # C-1

**Schools and Libraries Universal Service Program
Services Ordered and Certification Form 471
Application Display**

Block 1: Billed Entity Information

Applicant's Form Identifier: SOKTY7-1

471 Application Number: 387740

Cert. Postmark Date: 02/04/2004

Out of Window Letter Date:

Funding Year: 07/01/2004 - 06/30/2005

Form Status: CERTIFIED - In Window

Billed Entity Number: 139846

RAL Date:

Name: SOUTHERN OKLAHOMA TECHNOLOGY CENTER

Address: 2610 SAM NOBLE PKWY

City: ARDMORE State: OK Zip: 73401 2100

Contact Name: Debi Sovereign or Jane Kellogg

Address: 902 Arlington Cntr, #136

City: Ada State: OK Zip: 74820 2883

Type of Application: SCHOOL DISTRICT

Ineligible Orgs: N

Block 3: Impact of Services Ordered in THIS Application

Number of students to be served: 302

Number of library patrons to be served:

SERVICE DESCRIPTION	BEFORE ORDER	AFTER ORDER
a. (Schools/districts/consortia only) Telephone service: How many classrooms had phone service before and after your order?	106	106
b. High-bandwidth voice/data/video service: How many buildings served before and after your order?	15	21
c. High-bandwidth voice/data/video service: Highest speed to a building before and after your order?	T1	T1
d. Dial-up Internet connections: How many before and after your order?	2	7
e. Dial-up Internet connections: Highest speed before and after your order?	56K	56K
f. Direct connections to the Internet: How many before and after your order?	3	8
g. Direct connections to the Internet: Highest speed before and after your order?	T1	T1
h. Internet access(for schools): How many rooms have Internet access before and after your order?	106	106
i. Internet Access: How many computers (or other devices) with Internet access before and after your order?	500	500

Block 4: Worksheets

(See Correction next page)

Worksheet A No: 512870

Student Count: 302

Weighted Product (Sum. Column 8): 241.6

1. School Name: SOUTHERN OKLAHOMA TECHNOLOGY CENTER
 2. Entity Number: 83929
 3. Rural/Urban: Rural
 4. Student Count: 302
 5. NSLP Students: 188
 6. NSLP Students/Students: 65.562%
 7. Discount: 80%
 8. Weighted Product: 241.6

9050

Block 5: Discount Funding Request(s)

FRN: 1149112 FCDL Date:	
11. Category of Service: Telecommunications Service	12. 470 Application Number: 210600000468013
13. SPIN: 143004662	14. Service Provider Name: Southwestern Bell Telephone Company
15. Contract Number: T	16. Billing Account Number: 580 223 2070
17. Allowable Contract Date: 12/15/2003	18. Contract Award Date:
19a. Service Start Date: 07/01/2004	19b. Service End Date: 06/30/2005
20. Contract Expiration Date:	
21. Attachment #: 1	22. Block 4 Entity Number: 83929
23a. Monthly Charges: \$476.05	23b. Ineligible monthly amt.: \$0.00
23c. Eligible monthly amt.: \$476.05	23d. Number of months of service: 12
23e. Annual pre-discount amount for eligible recurring charges (23c x 23d): \$5,712.60	
23f. Annual non-recurring (one-time) charges: \$0.00	23g. Ineligible non-recurring amt.: \$0.00
23h. Annual pre-discount amount for eligible non-recurring charges (23f - 23g): \$0.00	
23i. Total program year pre-discount amount (23e + 23h): \$5,712.60	
23j. % discount (from Block 4): 80	
23k. Funding Commitment Request (23i x 23j): \$4,570.08	

FRN: 1149115 FCDL Date:	
11. Category of Service: Telecommunications Service	12. 470 Application Number: 210600000468013
13. SPIN: 143004662	14. Service Provider Name: Southwestern Bell Telephone Company
15. Contract Number: T	16. Billing Account Number: 580 223 2070
17. Allowable Contract Date: 12/15/2003	18. Contract Award Date:
19a. Service Start Date: 07/01/2004	19b. Service End Date: 06/30/2005
20. Contract Expiration Date:	
21. Attachment #: 2	22. Block 4 Entity Number: 83929
23a. Monthly Charges: \$445.80	23b. Ineligible monthly amt.: \$0.00
23c. Eligible monthly amt.: \$445.80	23d. Number of months of service: 12
23e. Annual pre-discount amount for eligible recurring charges (23c x 23d): \$5,349.60	
23f. Annual non-recurring (one-time) charges: \$0.00	23g. Ineligible non-recurring amt.: \$0.00
23h. Annual pre-discount amount for eligible non-recurring charges (23f - 23g): \$0.00	
23i. Total program year pre-discount amount (23e + 23h): \$5,349.60	
23j. % discount (from Block 4): 80	
23k. Funding Commitment Request (23i x 23j): \$4,279.68	

FRN: 1149124 FCDL Date:	
11. Category of Service: Telecommunications Service	12. 470 Application Number: 210600000468013
13. SPIN: 143004662	14. Service Provider Name: Southwestern Bell Telephone Company
15. Contract Number: T	16. Billing Account Number: N/A
17. Allowable Contract Date: 12/15/2003	18. Contract Award Date:

ATTACHMENT # C-3



Universal Service Administrative Company
Schools & Libraries Division

FORM 471 RECEIPT ACKNOWLEDGMENT LETTER
(Funding Year 2004: 07/01/2004 - 06/30/2005)

February 12, 2004

Debi Sovereign or Jane Kellogg
SOUTHERN OKLAHOMA TECHNOLOGY CENTER
902 Arlington Cntr, #136
Ada, OK 74820-2883

Re: Form 471 Application Number: 387740
Funding Year 2004: 07/01/2004 - 06/30/2005
Applicant's Form Identifier: SOKTY7-1
Billed Entity Number: 139846

This notification is an acknowledgment of receipt and successful data entry of your ECC Form 471, "Services Ordered and Certification Form," reflecting \$104,326.14 in total program year pre-discount costs for services. This letter confirms that the Form 471 and signed or electronically certified Form 471 Certification have been received. Please note that the later of these Form 471 application materials was postmarked or received by the Schools and Libraries Division (SLD) on 02/04/2004. Your application will be considered within the Form 471 application filing window wherein all applications that meet the Minimum Processing Standards are treated as though they were received on the same day. It is important that you retain this Form 471 Receipt Acknowledgment Letter (RAL) for your records.

NOTE: Item 25 on the Form 471 is a certification that you have secured access to the resources necessary to pay for (1) the non-discount portion of the costs for eligible services within the funding year, as well as (2) the ineligible products and services to make effective use of the eligible services you have requested. "Secured access" means that you can show that these funds are, or will be, part of your annual budget; or, if you are obtaining the funds from an outside revenue source, that these funds have been acquired or committed. IF YOU OBTAIN THESE FUNDS FROM AN OUTSIDE SOURCE, THE FUNDS MUST NOT COME DIRECTLY OR INDIRECTLY FROM YOUR SERVICE PROVIDER(S). YOUR SERVICE PROVIDER(S) MAY NOT WAIVE THE NON-DISCOUNT PORTION OF THE COSTS.

THIS LETTER DOES NOT CONTAIN ANY DECISIONS CONCERNING YOUR REQUESTS FOR DISCOUNTS. NOTE, HOWEVER, THE THREE-WEEK RESPONSE DEADLINE DESCRIBED BELOW.

It is important that you keep the Form 471 Application Number cited above for future communications with the SLD. Our Program Integrity Assurance (PIA) Team will now review your application for compliance with program rules. Once the review of your application has been completed, you will receive one or more Funding Commitment Decision Letters (FCDLs) to inform you of our decisions on your Funding Requests. You cannot assume that USAC will approve the discounts for which you are applying before an FCDL is issued.

ALLOWABLE CORRECTIONS USING THE RAL (ACT WITHIN THREE WEEKS!)

If you find data entry errors on this letter, or you previously identified errors on your Form 471, certain of these errors can be corrected using this Form 471 RAL.

- You MUST, at a minimum, include the signature, printed name and official title of either the contact person on this letter or the authorized person on the Form 471.
- Requests must be received or postmarked within three weeks of the date on this letter.

Form 471 RAL Block 5 Funding Requests Report

THIS REPORT DOES NOT CONTAIN ANY DECISIONS CONCERNING YOUR REQUESTS FOR DISCOUNTS.

FRN: 1149112
SPIN: 143004662 Service Provider Name: Southwestern Bell Telephone Company
Category of Services: Telecommunications Service
Site Identifier: 83929
Pre-discount \$ Amount: \$5,712.60
Discount Percentage: ~~80%~~ 90% DS

FRN: 1149115
SPIN: 143004662 Service Provider Name: Southwestern Bell Telephone Company
Category of Services: Telecommunications Service
Site Identifier: 83929
Pre-discount \$ Amount: \$5,349.60
Discount Percentage: ~~80%~~ 90% DS

FRN: 1149124
SPIN: 143004662 Service Provider Name: Southwestern Bell Telephone Company
Category of Services: Telecommunications Service
Site Identifier: 83929
Pre-discount \$ Amount: \$19,185.50
Discount Percentage: ~~80%~~ 90% DS

FRN: 1149126
SPIN: 143003906 Service Provider Name: Excel Telecommunications, Inc.
Category of Services: Telecommunications Service
Site Identifier: 83929
Pre-discount \$ Amount: \$1,224.60
Discount Percentage: ~~80%~~ 90% DS

FRN: 1149129
SPIN: 143002379 Service Provider Name: Chickasaw Tel. Co.
Category of Services: Telecommunications Service
Site Identifier: 83929
Pre-discount \$ Amount: \$922.80
Discount Percentage: ~~80%~~ 90% DS

FRN: 1149138
SPIN: 143025240 Service Provider Name: Cingular Wireless Inc.
Category of Services: Telecommunications Service
Site Identifier: 83929
Pre-discount \$ Amount: \$10,336.80
Discount Percentage: ~~80%~~ 90% DS

FRN: 1149141
SPIN: 143025240 Service Provider Name: Cingular Wireless Inc.
Category of Services: Telecommunications Service
Site Identifier: 83929
Pre-discount \$ Amount: \$2,399.04
Discount Percentage: ~~80%~~ 90% DS

FRN: 1149145
SPIN: 143019377 Service Provider Name: AirWaves Plus, Inc.
Category of Services: Telecommunications Service
Site Identifier: 83929
Pre-discount \$ Amount: \$1,194.00
Discount Percentage: ~~80%~~ 90% DS

FRN: 1149150
SPIN: 143019377 Service Provider Name: AirWaves Plus, Inc.
Category of Services: Telecommunications Service
Site Identifier: 83929
Pre-discount \$ Amount: \$2,677.80
Discount Percentage: ~~80%~~ 90% DS

FRN: 1149158
SPIN: 143015254 Service Provider Name: OneNet (Oklahoma State Regents)
Category of Services: Internet Access
Site Identifier: 83929
Pre-discount \$ Amount: \$54,844.00
Discount Percentage: ~~80%~~ 90% DS

FRN: 1149164
SPIN: 143010484 Service Provider Name: Cable One, Inc
Category of Services: Internet Access
Site Identifier: 83929
Pre-discount \$ Amount: \$479.40
Discount Percentage: 80% *90% DJ*

TRANSMISSION VERIFICATION REPORT

TIME : 02/29/2004 00:42
NAME : KELLOGG & SOVEREIGN
FAX : 5803322532
TEL : 5803321444
SER. # : BROM1J867089

DATE, TIME	02/29 00:40
FAX NO./NAME	19735996526
DURATION	00:02:44
PAGE(S)	09
RESULT	OK
MODE	STANDARD ECM

KELLOGG & SOVEREIGN CONSULTING, LLC

902 Arlington Center, PMB 136
Ada, OK 74820
office: 580.332.1444
fax: 580.332.2532
email: dsovereign@kelloggllc.com

JUST THE FAX

Send to: Data Entry Corrections	SLD
Fax: 973-599-6526	Phone: 888-203-8100
From: Debi Sovereign	
Date: 3/2/04	No. Pages (incl. cover): 8
RE: Form 471 App #387741, BEN 139846, Southern Oklahoma Technology Center	

Please make the following correction as shown on the "marked up" Receipt Acknowledgement Letter for Southern Oklahoma Technology Center:

Block 4, Worksheet A No. 512871
Item 5. NSLP Students should be 233 (not 198)

This will change discount percentage to 90% for the following FRNs:
1153748, 1153754, 1153768, 1153771, 1153776, 1153789, 1153802, 1153816, 1153826,
1153831, 1153840

Thank you,

ATTACHMENT # C-7

Schools and Libraries Universal Service Program
Services Ordered and Certification Form 471
Application Display

Block 1: Billed Entity Information

Applicant's Form Identifier: SOKTY7-2

471 Application Number: 387741

Cert. Postmark Date: 02/03/2004

Out of Window Letter Date:

Funding Year: 07/01/2004 - 06/30/2005

Form Status: CERTIFIED - In Window

Billed Entity Number: 139846

RAL Date:

Name: SOUTHERN OKLAHOMA TECHNOLOGY CENTER

Address: 2610 SAM NOBLE PKWY

City: ARDMORE State: OK Zip: 73401 2100

Contact Name: Debi Sovereign or Jane Kellogg

Address: 902 Arlington Cntr, #136

City: Ada State: OK Zip: 74820 2883

Type of Application: SCHOOL DISTRICT

Ineligible Orgs: N

Block 3: Impact of Services Ordered in THIS Application

Number of students to be served: 302

Number of library patrons to be served:

SERVICE DESCRIPTION	BEFORE ORDER	AFTER ORDER
a. (Schools/districts/consortia only) Telephone service: How many classrooms had phone service before and after your order?	106	106
b. High-bandwidth voice/data/video service: How many buildings served before and after your order?	15	21
c. High-bandwidth voice/data/video service: Highest speed to a building before and after your order?	T1	T1
d. Dial-up Internet connections: How many before and after your order?	2	7
e. Dial-up Internet connections: Highest speed before and after your order?	56K	56K
f. Direct connections to the Internet: How many before and after your order?	3	8
g. Direct connections to the Internet: Highest speed before and after your order?	T1	T1
h. Internet access(for schools): How many rooms have Internet access before and after your order?	106	106
i. Internet Access: How many computers (or other devices) with Internet access before and after your order?	500	500

Block 4: Worksheets

Worksheet A No: 512871

Student Count: 302

Weighted Product (Sum. Column 8): 241.6

Shared Discount: N/A

C-8
 ATTACHMENT #

NSLP = 733 Df 3/2/04

1. School Name: SOUTHERN OKLAHOMA TECHNOLOGY CENTER
 2. Entity Number: 83929 3. Rural/Urban: Rural
 4. Student Count: 302 5. NSLP Students: 198 6. NSLP Students/Students: 65.562%
 7. Discount: 80% 8. Weighted Product: 241.6

Block 5: Discount Funding Request(s)

FRN: 1153748 FCDL Date:	
11. Category of Service: Internal Connections	12. 470 Application Number: 210600000468013
13. SPIN: 143026119	14. Service Provider Name: SK Shemor & Associates, LLC
15. Contract Number: NTKDPS	16. Billing Account Number:
17. Allowable Contract Date: 12/15/2003	18. Contract Award Date: 01/27/2004
19a. Service Start Date: 07/01/2004	19b. Service End Date:
20. Contract Expiration Date: 06/30/2005	
21. Attachment #: 1	22. Block 4 Entity Number: 83929
23a. Monthly Charges: \$.00	23b. Ineligible monthly amt.: \$.00
23c. Eligible monthly amt.: \$.00	23d. Number of months of service: 12
23e. Annual pre-discount amount for eligible recurring charges (23c x 23d): \$.00	
23f. Annual non-recurring (one-time) charges: \$67,845.55	23g. Ineligible non-recurring amt.: \$.00
23h. Annual pre-discount amount for eligible non-recurring charges (23f - 23g): \$67,845.55	
23i. Total program year pre-discount amount (23e + 23h): \$67,845.55	
23j. % discount (from Block 4): 80	
23k. Funding Commitment Request (23i x 23j): \$54,276.44	

FRN: 1153754 FCDL Date:	
11. Category of Service: Internal Connections	12. 470 Application Number: 210600000468013
13. SPIN: 143002379	14. Service Provider Name: Chickasaw Tel. Co.
15. Contract Number: SWTC	16. Billing Account Number:
17. Allowable Contract Date: 12/15/2003	18. Contract Award Date: 01/27/2004
19a. Service Start Date: 07/01/2004	19b. Service End Date:
20. Contract Expiration Date: 06/30/2005	
21. Attachment #: 1	22. Block 4 Entity Number: 83929
23a. Monthly Charges: \$.00	23b. Ineligible monthly amt.: \$.00
23c. Eligible monthly amt.: \$.00	23d. Number of months of service: 12
23e. Annual pre-discount amount for eligible recurring charges (23c x 23d): \$.00	
23f. Annual non-recurring (one-time) charges: \$41,590.40	23g. Ineligible non-recurring amt.: \$.00
23h. Annual pre-discount amount for eligible non-recurring charges (23f - 23g): \$41,590.40	
23i. Total program year pre-discount amount (23e + 23h): \$41,590.40	
23j. % discount (from Block 4): 80	
23k. Funding Commitment Request (23i x 23j): \$33,272.32	

FRN: 1153768 FCDL Date:	
11. Category of Service: Internal Connections	12. 470 Application Number: 210600000468013
13. SPIN: 143002379	14. Service Provider Name: Chickasaw Tel. Co.
15. Contract Number: 713-PIXFRWL	16. Billing Account Number:
17. Allowable Contract Date: 12/15/2003	18. Contract Award Date: 01/27/2004

ATTACHMENT # C-9



Universal Service Administrative Company

Schools & Libraries Division

FORM 471 RECEIPT ACKNOWLEDGMENT LETTER
(Funding Year 2004: 07/01/2004 - 06/30/2005)

February 11, 2004

Debi Sovereign or Jane Kellogg
SOUTHERN OKLAHOMA TECHNOLOGY CENTER
902 Arlington Cntr, #136
Ada, OK 74820-2883

Re: Form 471 Application Number: 387741
Funding Year 2004: 07/01/2004 - 06/30/2005
Applicant's Form Identifier: SOKTY7-2
Billed Entity Number: 139846

This notification is an acknowledgment of receipt and successful data entry of your FCC Form 471, "Services Ordered and Certification Form," reflecting \$327,833.08 in total program year pre-discount costs for services. This letter confirms that the Form 471 and signed or electronically certified Form 471 Certification have been received. Please note that the later of these Form 471 application materials was postmarked or received by the Schools and Libraries Division (SLD) on 02/03/2004. Your application will be considered within the Form 471 application filing window wherein all applications that meet the Minimum Processing Standards are treated as though they were received on the same day. It is important that you retain this Form 471 Receipt Acknowledgment Letter (RAL) for your records.

NOTE: Item 25 on the Form 471 is a certification that you have secured access to the resources necessary to pay for (1) the non-discount portion of the costs for eligible services within the funding year, as well as (2) the ineligible products and services to make effective use of the eligible services you have requested. "Secured access" means that you can show that these funds are, or will be, part of your annual budget; or, if you are obtaining the funds from an outside revenue source, that these funds have been acquired or committed. IF YOU OBTAIN THESE FUNDS FROM AN OUTSIDE SOURCE, THE FUNDS MUST NOT COME DIRECTLY OR INDIRECTLY FROM YOUR SERVICE PROVIDER(S). YOUR SERVICE PROVIDER(S) MAY NOT WAIVE THE NON-DISCOUNT PORTION OF THE COSTS.

THIS LETTER DOES NOT CONTAIN ANY DECISIONS CONCERNING YOUR REQUESTS FOR DISCOUNTS. NOTE, HOWEVER, THE THREE-WEEK RESPONSE DEADLINE DESCRIBED BELOW.

It is important that you keep the Form 471 Application Number cited above for future communications with the SLD. Our Program Integrity Assurance (PIA) Team will now review your application for compliance with program rules. Once the review of your application has been completed, you will receive one or more Funding Commitment Decision Letters (FCDLs) to inform you of our decisions on your Funding Requests. You cannot assume that USAC will approve the discounts for which you are applying before an FCDL is issued.

ALLOWABLE CORRECTIONS USING THE RAL (ACT WITHIN THREE WEEKS!)

If you find data entry errors on this letter, or you previously identified errors on your Form 471, certain of these errors can be corrected using this Form 471 RAL.

- You MUST, at a minimum, include the signature, printed name and official title of either the contact person on this letter or the authorized person on the Form 471.
- Requests must be received or postmarked within three weeks of the date on this letter.

Form 471 RAL Block 5 Funding Requests Report

THIS REPORT DOES NOT CONTAIN ANY DECISIONS CONCERNING YOUR REQUESTS FOR DISCOUNTS.

FRN: 1153748
 SPIN: 143026119 Service Provider Name: SK Shemor & Associates, LLC
 Category of Services: Internal Connections
 Site Identifier: 83929
 Pre-discount \$ Amount: \$67,845.55
 Discount Percentage: ~~80%~~ 90% *DS*

FRN: 1153754
 SPIN: 143002379 Service Provider Name: Chickasaw Tel. Co.
 Category of Services: Internal Connections
 Site Identifier: 83929
 Pre-discount \$ Amount: \$41,590.40
 Discount Percentage: ~~80%~~ 90% *DS*

FRN: 1153768
 SPIN: 143002379 Service Provider Name: Chickasaw Tel. Co.
 Category of Services: Internal Connections
 Site Identifier: 83929
 Pre-discount \$ Amount: \$3,964.80
 Discount Percentage: ~~80%~~ 90% *DS*

FRN: 1153771
 SPIN: 143006043 Service Provider Name: ISC Computer Inc.
 Category of Services: Internal Connections
 Site Identifier: 83929
 Pre-discount \$ Amount: \$9,600.00
 Discount Percentage: ~~80%~~ 90% *DS*

FRN: 1153776
 SPIN: 143017018 Service Provider Name: Arbuckle Communications, Inc.
 Category of Services: Internal Connections
 Site Identifier: 83929
 Pre-discount \$ Amount: \$43,716.20
 Discount Percentage: ~~80%~~ 90% *DS*

FRN: 1153789
 SPIN: 143002379 Service Provider Name: Chickasaw Tel. Co.
 Category of Services: Internal Connections
 Site Identifier: 83929
 Pre-discount \$ Amount: \$548.80
 Discount Percentage: ~~80%~~ 90% *DS*

FRN: 1153802
 SPIN: 143002379 Service Provider Name: Chickasaw Tel. Co.
 Category of Services: Internal Connections
 Site Identifier: 83929
 Pre-discount \$ Amount: \$31,181.40
 Discount Percentage: ~~80%~~ 90% *DS*

FRN: 1153816
 SPIN: 143004340 Service Provider Name: Dell Marketing LP
 Category of Services: Internal Connections
 Site Identifier: 83929
 Pre-discount \$ Amount: \$34,531.20
 Discount Percentage: ~~80%~~ 90% *DS*

FRN: 1153826
 SPIN: 143004340 Service Provider Name: Dell Marketing LP
 Category of Services: Internal Connections
 Site Identifier: 83929
 Pre-discount \$ Amount: \$2,951.28
 Discount Percentage: ~~80%~~ 90% *DS*

FRN: 1153831
 SPIN: 143004340 Service Provider Name: Dell Marketing LP
 Category of Services: Internal Connections
 Site Identifier: 83929
 Pre-discount \$ Amount: \$3,429.10
 Discount Percentage: ~~80%~~ 90% *DS*

ERN: 1153840
SPIN: 143004812 Service Provider Name: SBC DataComm
Category of Services: Internal Connections
Site Identifier: 83929
Pre-discount \$ Amount: \$88,474.35
Discount Percentage: ~~80%~~ 90% *DL*

Southern Oklahoma Technology Center

BLOCK 4, ATTACHMENT # 1-A

Income Survey Results:

Site	Total Enrollment	Surveys Received	% Received	# Eligible Free Red lunch	%	Prorated # Eligible	%
10-V020-900	302	257	85%	198	77%	233	77%
Total	302	257		198		233	

Surveys are kept on file at Southern Oklahoma Technology Center Administration Offices
2610 Sam Noble Parkway, Ardmore, Oklahoma 73401
See Block 4, Attachment 1-C for sample survey

Entity # 139846 (S. OK Technology Cntr)
Form 471 Application #387741
Applicant's Form Identifier: SOKTY7-2
Contact Person: D Sovereign & J Kellogg
Email: erate@kelloggllc.com

ATTACHMENT # C-13

E-RATE INCOME SURVEY SUMMARY - SCHOOL YEAR 2003-2004

District: Southern OK Technology Center

Superintendent Signature: CR Bob Gragg, Ph.D.

Date: 10-15-03

Printed Name: C.R. Bob Gragg, Ph.D.

SCHOOL INFORMATION			
School Site Number	SITE NAME	Grade Span Low-High	(a) Site Enrollment (PK-12) *
900	SOTC - ARDMORE	9-12	302

SURVEY INFORMATION			
(b) # Surveys Sent	(c) # Students eligible for F/R lunches (PK-12)*	(d) # Students NOT eligible for F/R lunch (PK-12)*	(e) Total# Students Listed on Survey (PK-12)*
302 257	198	59	257

Please mail or fax completed summary sheet AND a copy of ONE completed income survey to:

Debi Sovereign, Kellogg & Sovereign Consulting LLC
 902 Arlington Center, PMB 136; Ada, OK 74820
 Phone: 580-332-1444; Fax: 580-332-2532

RETURN NO LATER THAN NOVEMBER 30, 2003

*Include ALL students. Pre-K through 12th grade

Entity # 139846 (S. OK Technology Cntr)
 Form 471 Application #387741
 Applicant's Form Identifier: SOKTY7-2
 Contact Person: D Sovereign & J Kellogg
 Email: erate@kelloggllc.com

ATTACHMENT # C-14

Confidential E-Rate Inco : Survey

2003-2004 School Year¹

The following table shows the income levels used by the E-rate program to determine discounts on technology services for our schools and libraries. Locate your household size on the table below. Please check the following:

☒ My household income is at or below the amount listed for our household size.
****CIRCLE YOUR HOUSEHOLD SIZE AND INCOME LEVEL BELOW****

☐ My household income is above the amount listed for our household size.
DO NOT CIRCLE ANYTHING IN THE TABLE.

Household Size (Adults & Children)	Est. Annual Income (As Reported to IRS)	Monthly Income	Weekly Income
1	\$16,613	\$1,385	\$320
2	22,422	1,869	432
3	28,231	2,353	543
4	34,040	2,837	655
5	39,849	3,321	767
6	45,658	3,805	879
7	51,467	4,289	990
8*	57,276	4,773	1,102

(* If more than 8 household members, add \$5,809 to the yearly income for each additional family member.)

Please list all students in your household that attend public school. (Enter the grade they will be entering in Fall, 2003)

Name	Grade	School
Amanda	11	Marietta

Please circle any of the following programs your family participates in:

- a. Medicaid
- b. Food Stamps
- c. Supplementary Security Income
- d. Federal Housing Assistance or Section 8
- e. Low-Income Home Energy Assistance Program

I certify that the above information is, to the best of my knowledge, true and complete:

Signature: Marilyn Date: 6-30-03
 Printed Name: MARILYN Phone: _____
 Address: 73448 Marietta GA

¹ Income Eligibility Guidelines for Reduced Priced Meals, July 1, 2003-June 30, "
 (<http://www.fns.usda.gov/audits/ERATE-2003-2004.pdf>)

Entity # 139846 (S. OK Technology Cntr)
 Form 471 Application #387741
 Applicant's Form Identifier: SOKTY7-2
 Contact Person: D Sovereign & J Kellogg
 Email: erate@kelloggllc.com

ATTACHMENT # C-15

ATTACHMENT D

Excerpt from
FCC Fifth Report and Order (FCC 04-190)
Released August 13, 2004

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)	
)	
Schools and Libraries Universal Service)	
Support Mechanism)	CC Docket No. 02-6
)	
)	

**FIFTH REPORT AND ORDER
AND ORDER**

Adopted: August 4, 2004

Released: August 13, 2004

By the Commission: Chairman Powell, and Commissioners Abernathy, Copps, and Adelstein issuing separate statements; Commissioner Martin approving in part, dissenting in part, and issuing a statement.

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APPENDIX A – LIST OF COMMENTERS

APPENDIX B – FINAL RULES

request.

26. Failure to Complete Service within the Funding Year. We conclude that the failure to complete delivery of services by the relevant deadline for a particular funding year is a rule violation that warrants recovery of all funds disbursed for services installed or delivered after the close of the funding year. We note that parties are always free to seek an extension of time to install non-recurring services from USAC, consistent with the conditions set by the Commission for such an extension. Such extensions have been granted in situations where installation cannot be completed for reasons outside the control of the beneficiary.⁴⁷ Generally, however, the Commission requires service to be completed within one Funding Year, in order to promote equity among applicants and to avoid waste.⁴⁸

27. Discount Calculation Violation. When applicants fail to calculate properly their appropriate discount rate, the amount disbursed in violation of this rule is the difference between the amount of support to which the beneficiary is legitimately allowed and the amount requested or provided. For instance, in a situation in which the beneficiary made a clerical error in calculating the level of participation in the school lunch program, or failed to use an approved methodology for calculating the level of school lunch participation, the beneficiary may legitimately receive support under a recalculated discount rate. In these circumstances, the amount to recover is the difference between the incorrectly calculated amount and the amount recalculated with the appropriate discount.⁴⁹ We emphasize, however, that in the narrow circumstance where there is evidence that an applicant has manipulated its discount rate in a deliberate attempt to defraud the government, full recovery may be appropriate. Moreover, in situations where the applicant would not have qualified for any support for internal connections had it properly applied the discount, the recovery would be the entire amount disbursed.

28. Service Not Provided for Full Funding Year. Similarly, if an applicant requested and received funding for a full year, and the service provider billed for the full year, but provided services for less than the full year, we believe it would be appropriate to pro-rate support and recover the excess. Such adjustments are ordinarily made prior to disbursement when discovered by USAC through normal review processes.

29. Recovery Only for Waste, Fraud and Abuse. We reject the argument some commenters make that applicants should not be required to repay the fund unless waste, fraud or abuse is established.⁵⁰ We believe that there may be instances in which rule violations undermine statutory requirements or substantive policy goals of the program, but may not rise to the level of waste, fraud or abuse. For example, a request for an ineligible service might not entail waste, fraud or abuse, but it is still a violation for which recovery is necessary. While we appreciate that it may impose some hardship to make repayment in some situations, a statutory or rule violation cannot be absolved merely because the nature of the violation does not implicate waste, fraud or abuse. Moreover, to limit recovery to situations involving waste, fraud or abuse would place us in the position of condoning violation of the program's

⁴⁷ In the *Non-Recurring Services Order*, the Commission specified the circumstances under which a school or library could receive supported services after the conclusion of the normal funding year. *Federal-State Joint Board on Universal Service*, CC Docket 96-45, Report and Order, 16 FCC Rcd 13510 (2001) (*Non-Recurring Services Order*).

⁴⁸ See *Universal Service Order*, 12 FCC Rcd at 9062 para. 544.

⁴⁹ This is analogous to the manner in which USAC addresses such situations if it discovers during the application review process that the applicant has made an arithmetic error.

⁵⁰ See, e.g., ALA Comments at 21; On-Tech Comments at 12-13; Pennsylvania DOE Comments at 34; SBC Comments at 5 (proposing no recovery for rule violations; recovery would occur for statutory violations); Weisinger Comments at 15, 25; Cox Reply Comments at 9; GCI Reply Comments at 2 (funds spent in good faith to promote objectives of program should not be recovered for technical violations).

ATTACHMENT E

Commissioner Statements FCC Fifth Report and Order

Commissioner Michael J. Copps
Commissioner Jonathon S. Adelstein

STATEMENT OF
COMMISSIONER MICHAEL J. COPPS

In the matter of Schools and Libraries Universal Service Support Mechanism, CC Docket No. 02-6

Here we have a program that has been absolutely front-and-center in ushering children around this country into the Internet age. But we understand that the great progress we have made with schools and libraries can fade without constant attention and care. This item sets forth a needed framework that provides guidance for the recovery of funds from applicants that have failed to comply with the statute or with our rules. It establishes a timeframe for audits and investigations. And to enhance oversight and enforcement, it provides standards for document retention by program beneficiaries. These are good and helpful steps that enhance the integrity of the program and also bring some clarity to program applicants.

This new process provides more Commission oversight. It encourages closer oversight by the five of us and the more expeditious handling of disputes over applications. The underlying goal here is speedy resolution of any problems that audits turn up. I think we have found a balanced and efficient way to handle this. In our decision, we instruct the Bureau to take the first crack at reviewing audit findings relating to the schools and libraries support mechanism. But Bureau findings are subject to Commission review, and we commit here to rendering decisions on appeals within the very tight time-frame of six months. I expect this division of resources will serve our goals of reducing waste, fraud and abuse better than tying every finding up in a cumbersome and protracted full Commission process. If it does not, however, I stand willing to revisit this aspect of today's decision.

A large part of the challenge we face here is crafting a balanced approach. Vigilant oversight and procedures adequate to forestalling abuse are, of course, essential. But it would also be possible to go overboard by multiplying the complexity of the E-Rate program and making the process so cumbersome as to discourage applicants from taking advantage of it. If needy schools and libraries lack the resources to navigate a growing minefield of rules and requirements, we could wind up deterring the very applicants this program was designed to benefit and, worse, denying thousands of children access to the communications services they need to grow into fully productive citizens. So we must always keep the beneficiaries in mind as we work to resolve problems in the program. I think we head in that direction today, and I am pleased to support the item.

STATEMENT OF
COMMISSIONER JONATHAN S. ADELSTEIN

In the matter of Schools and Libraries Universal Service Support Mechanism, CC Docket No. 02-6

Since its inception in 1996, the universal service support mechanism for schools and libraries (commonly referred to as the E-rate program) has opened up a new world of learning and opportunity for millions of school children and library patrons. It has proven an enormously successful educational initiative. The E-Rate program has allowed us to achieve remarkable results in connecting classrooms and libraries in rural and urban areas to the Internet and connecting America's schoolchildren to the Information Age. By strengthening our schools and libraries, we have given our children access to the tools that they need -- that we, as a nation, need -- to compete and succeed in an increasingly global economy.

To ensure the continued success of the E-Rate program, we must remain committed to monitoring, auditing, reviewing and reinforcing the program. This Order demonstrates our commitment to the program and to its integrity. We take important steps here to further our ongoing effort to safeguard against waste, fraud, and abuse. The measures we adopt bolster our audit processes, which are essential to the oversight of the universal service fund, and they respond to programmatic concerns raised by our Office of Inspector General. The Order also sets into motion a process for reviewing USAC administrative procedures, which will afford the Commission the opportunity to ensure the transparency, effectiveness, and efficiency of the program's administration. The item also provides useful guidance on the content and approval of Technology Plans, which are used by applicants to assess and plan for their telecommunications needs.

This Order represents one important part of a larger effort to ensure the integrity and success of the E-Rate program. Through this Order and our previous Orders adopted in the past two years, we are working to safeguard against waste, fraud, and abuse, and, at the same time, to simplify and clarify the application process, so that we don't set up unnecessary obstacles for deserving applicants. As this item recognizes, our job is not done. Nevertheless, we take important steps forward in this Order. I appreciate the commitment of my colleagues, USAC, the service providers, and the schools and libraries, as we continue to advance these intertwined goals.

ATTACHMENT F

Funding Commitment Decision Letter
Form 471 Application # 387740



Universal Service Administrative Company
Schools & Libraries Division

FUNDING COMMITMENT DECISION LETTER

(Funding Year 2004: 07/01/2004 - 06/30/2005)

June 30, 2004

Debi Sovereign or Jane Kellogg
SOUTHERN OKLAHOMA TECHNOLOGY CENTER
902 Arlington Cntr, #136
Ada, OK 74820-2883

Re: Form 471 Application Number: 387740
Funding Year 2004: 07/01/2004 - 06/30/2005
Billed Entity Number: 139846
Applicant's Form Identifier: SOKTY7-1

Thank you for your Funding Year 2004 E-rate application and for any assistance you provided throughout our review. Here is the current status of the funding request(s) featured in the Funding Commitment Report at the end of this letter.

- The amount, \$83,460.91 is "Approved."

Please refer to the Funding Commitment Report on the page following this letter for specific funding request decisions and explanations.

The Important Reminders and Deadlines immediately preceding this letter are provided to assist you throughout the application process.

NEXT STEPS

- Review technology planning approval requirements
- Review CIPA Requirements
- File Form 486
- Invoice the SLD using the Form 474 (service providers) or Form 472 (Billed Entity)

FUNDING COMMITMENT REPORT

On the pages following this letter, we have provided a Funding Commitment Report for the Form 471 application cited above. The enclosed report includes a list of the Funding Request Number(s) (FRNs) from your application. The SLD is also sending this information to your service provider(s) so preparations can be made to begin implementing your E-rate discount(s) after you file your Form 486. Immediately preceding the Funding Commitment Report, you will find a guide that provides a definition for each line of the Report.

TO APPEAL THIS DECISION:

If you wish to appeal the decision indicated in this letter, your appeal must be received by the SLD or postmarked within 60 days of the date of this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. In your letter of appeal:

1. Include the name, address, telephone number, fax number, and e-mail address (if available) for the person who can most readily discuss this appeal with us.
2. State outright that your letter is an appeal. Identify which Funding Commitment Decision(s) you are appealing. Indicate the relevant funding year and the date of the FCDL. Your letter of appeal must also include the Billed Entity Name, the

FUNDING COMMITMENT REPORT

Form 471 Application Number: 387740
Funding Request Number: 1149112 Funding Status: Funded
Services Ordered: Telecommunications Service
SPIN: 143004662 Service Provider Name: Southwestern Bell Telephone Comp
Contract Number: T
Billing Account Number: 580 223 2070
Service Start Date: 07/01/2004
Contract Expiration Date: 06/30/2005
Site Identifier: 83929
Annual Pre-discount Amount for Eligible Recurring Charges: \$5,712.60
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00
Pre-discount Amount: \$5,712.60
Discount Percentage Approved by the SLD: 80%
Funding Commitment Decision: \$4,570.08 - FRN approved as submitted

Funding Request Number: 1149115 Funding Status: Funded
Services Ordered: Telecommunications Service
SPIN: 143004662 Service Provider Name: Southwestern Bell Telephone Comp
Contract Number: T
Billing Account Number: 580 223 2070
Service Start Date: 07/01/2004
Contract Expiration Date: 06/30/2005
Site Identifier: 83929
Annual Pre-discount Amount for Eligible Recurring Charges: \$5,349.60
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00
Pre-discount Amount: \$5,349.60
Discount Percentage Approved by the SLD: 80%
Funding Commitment Decision: \$4,279.68 - FRN approved as submitted

Funding Request Number: 1149124 Funding Status: Funded
Services Ordered: Telecommunications Service
SPIN: 143004662 Service Provider Name: Southwestern Bell Telephone Comp
Contract Number: T
Billing Account Number: N/A
Service Start Date: 07/01/2004
Contract Expiration Date: 06/30/2005
Site Identifier: 83929
Annual Pre-discount Amount for Eligible Recurring Charges: \$18,960.00
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$225.50
Pre-discount Amount: \$19,185.50
Discount Percentage Approved by the SLD: 80%
Funding Commitment Decision: \$15,348.40 - FRN approved as submitted

Funding Request Number: 1149126 Funding Status: Funded
Services Ordered: Telecommunications Service
SPIN: 143003906 Service Provider Name: Excel Telecommunications
Contract Number: T
Billing Account Number: 580 223 2070
Service Start Date: 07/01/2004
Contract Expiration Date: 06/30/2005
Site Identifier: 83929
Annual Pre-discount Amount for Eligible Recurring Charges: \$1,224.60
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00
Pre-discount Amount: \$1,224.60
Discount Percentage Approved by the SLD: 80%
Funding Commitment Decision: \$979.68 - FRN approved as submitted

FUNDING COMMITMENT REPORT

Form 471 Application Number: 387740
Funding Request Number: 1149129 Funding Status: Funded
Services Ordered: Telecommunications Service
SPIN: 143002379 Service Provider Name: Chickasaw Tel. Co.
Contract Number: T
Billing Account Number: 580 622 6710
Service Start Date: 07/01/2004
Contract Expiration Date: 06/30/2005
Site Identifier: 83929
Annual Pre-discount Amount for Eligible Recurring Charges: \$922.80
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00
Pre-discount Amount: \$922.80
Discount Percentage Approved by the SLD: 80%
Funding Commitment Decision: \$738.24 - FRN approved as submitted

Funding Request Number: 1149138 Funding Status: Funded
Services Ordered: Telecommunications Service
SPIN: 143025240 Service Provider Name: Cingular Wireless Inc.
Contract Number: MTM
Billing Account Number: 497418414
Service Start Date: 07/01/2004
Contract Expiration Date: 06/30/2005
Site Identifier: 83929
Annual Pre-discount Amount for Eligible Recurring Charges: \$10,336.80
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00
Pre-discount Amount: \$10,336.80
Discount Percentage Approved by the SLD: 80%
Funding Commitment Decision: \$8,269.44 - FRN approved as submitted

Funding Request Number: 1149141 Funding Status: Funded
Services Ordered: Telecommunications Service
SPIN: 143025240 Service Provider Name: Cingular Wireless Inc.
Contract Number: MTM
Billing Account Number: N/A
Service Start Date: 07/01/2004
Contract Expiration Date: 06/30/2005
Site Identifier: 83929
Annual Pre-discount Amount for Eligible Recurring Charges: \$2,399.04
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00
Pre-discount Amount: \$2,399.04
Discount Percentage Approved by the SLD: 80%
Funding Commitment Decision: \$1,919.23 - FRN approved as submitted

Funding Request Number: 1149145 Funding Status: Funded
Services Ordered: Telecommunications Service
SPIN: 143019377 Service Provider Name: AirWaves Plus, Inc.
Contract Number: MTM
Billing Account Number: N/A
Service Start Date: 07/01/2004
Contract Expiration Date: 06/30/2005
Site Identifier: 83929
Annual Pre-discount Amount for Eligible Recurring Charges: \$1,194.00
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00
Pre-discount Amount: \$1,194.00
Discount Percentage Approved by the SLD: 80%
Funding Commitment Decision: \$955.20 - FRN approved as submitted

FUNDING COMMITMENT REPORT

Form 471 Application Number: 387740
Funding Request Number: 1149150 Funding Status: Funded
Services Ordered: Telecommunications Service
SPIN: 143019377 Service Provider Name: AirWaves Plus, Inc.
Contract Number: MTM
Billing Account Number: N/A
Service Start Date: 07/01/2004
Contract Expiration Date: 06/30/2005
Site Identifier: 83929
Annual Pre-discount Amount for Eligible Recurring Charges: \$2,677.80
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00
Pre-discount Amount: \$2,677.80
Discount Percentage Approved by the SLD: 80%
Funding Commitment Decision: \$2,142.24 - FRN approved as submitted

Funding Request Number: 1149158 Funding Status: Funded
Services Ordered: Internet Access
SPIN: 143015254 Service Provider Name: OneNet (Oklahoma State Regents)
Contract Number: MTM
Billing Account Number: 8040
Service Start Date: 07/01/2004
Contract Expiration Date: 06/30/2005
Site Identifier: 83929
Annual Pre-discount Amount for Eligible Recurring Charges: \$49,344.00
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$5,500.00
Pre-discount Amount: \$54,844.00
Discount Percentage Approved by the SLD: 80%
Funding Commitment Decision: \$43,875.20 - FRN approved as submitted

Funding Request Number: 1149164 Funding Status: Funded
Services Ordered: Internet Access
SPIN: 143010484 Service Provider Name: Cable One, Inc.
Contract Number: MTM
Billing Account Number: N/A
Service Start Date: 07/01/2004
Contract Expiration Date: 06/30/2005
Site Identifier: 83929
Annual Pre-discount Amount for Eligible Recurring Charges: \$479.40
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00
Pre-discount Amount: \$479.40
Discount Percentage Approved by the SLD: 80%
Funding Commitment Decision: \$383.52 - FRN approved as submitted

ATTACHMENT G

Listing of Funding Request Numbers Affected

SOUTHERN OKLAHOMA TECHNOLOGY CENTER-FUNDING REQUESTS AT 90% DISCOUNT RATE

FY 2004

471App#	FRN	SPIN	Service Provider	Service Description	Pre Disct Total		Disct Perc	Disct Amt	
387740	1149112	143004662	Southwestern Bell Telephone Co	Telephone	\$5,712.60		90%	\$5,141.34	
387740	1149115	143004662	Southwestern Bell Telephone Co	Long Distance	\$5,349.60		90%	\$4,814.64	
387740	1149124	143004662	Southwestern Bell Telephone Co	Telephone	\$19,185.50		90%	\$17,266.95	
387740	1149126	143003906	Excel Telecommunications, Inc.	Long Distance	\$1,224.60		90%	\$1,102.14	
387740	1149129	143002379	Chickasaw Tel. Co.	Telephone	\$922.80		90%	\$830.52	
387740	1149138	143025240	Cingular Wireless Inc.	Cellular Svcs	\$10,336.80		90%	\$9,303.12	
387740	1149141	143025240	Cingular Wireless Inc.	Cellular Svcs	\$2,399.04		90%	\$2,159.14	
387740	1149145	143019377	AirWaves Plus, Inc.	Paging Svcs	\$1,194.00		90%	\$1,074.60	
387740	1149150	143019377	AirWaves Plus, Inc.	Paging Svcs	\$2,677.80		90%	\$2,410.02	
387740	1149158	143015254	OneNet (Oklahoma State Reger	Internet Access	\$54,844.00		90%	\$49,359.60	
387740	1149164	143010484	Cable One, Inc	Internet Access	\$479.40		90%	\$431.46	
						\$104,326.14			\$93,893.53
387741	1153748	143026119	SK Shemor & Associates, LLC	Network Wiring	\$67,845.55		90%	\$61,061.00	
387741	1153754	143002379	Chickasaw Tel. Co.	Network Electronics	\$41,590.40		90%	\$37,431.36	
387741	1153768	143002379	Chickasaw Tel. Co.	Firewall	\$3,964.80		90%	\$3,568.32	
387741	1153771	143006043	ISC Computer Inc.	Network Mtc	\$9,600.00		90%	\$8,640.00	
387741	1153776	143017018	Arbuckle Communications, Inc.	PBX	\$43,716.20		90%	\$39,344.58	
387741	1153789	143002379	Chickasaw Tel. Co.	Router Mtc	\$548.80		90%	\$493.92	
387741	1153802	143002379	Chickasaw Tel. Co.	Router	\$31,181.40		90%	\$28,063.26	
387741	1153816	143004340	Dell Marketing LP	Server-DHCP	\$34,531.20		90%	\$31,078.08	
387741	1153826	143004340	Dell Marketing LP	Server Software	\$2,951.28		90%	\$2,656.15	
387741	1153831	143004340	Dell Marketing LP	Server Software	\$3,429.10		90%	\$3,086.19	
387741	1153840	143004812	SBC DataComm	Codec-Polycom	\$88,474.35		90%	\$79,626.92	
						\$327,833.08			\$295,049.77
						\$432,159.22	Sum Of Pre Disct Total:		\$388,943.30

0 • *

$$\begin{aligned}
 &90\% \quad 388,943.30 + \\
 &80\% \quad 345,727.37 = \\
 &\text{DIFF} = \underline{\underline{43,215.93}} *
 \end{aligned}$$

DIFFERENCE IN
 RATE DISCT BETWEEN 90%
 LEVEL AND 80% = \$43,215.93

ATTACHMENT # 6-1

SOUTHERN OKLAHOMA TECHNOLOGY CENTER - FUNDING REQUESTS AT 80% DISCOUNT

FY 2004

471App#	FRN	SPIN	Service Provider	Service Description	Pre Disc Total		Disc	Disc Amt	
387740	1149112	143004662	Southwestern Bell Telephone Co	Telephone	\$5,712.60		80%	\$4,570.08	
387740	1149115	143004662	Southwestern Bell Telephone Co	Long Distance	\$5,349.60		80%	\$4,279.68	
387740	1149124	143004662	Southwestern Bell Telephone Co	Telephone	\$19,185.50		80%	\$15,348.40	
387740	1149126	143003906	Excel Telecommunications, Inc.	Long Distance	\$1,224.60		80%	\$979.68	
387740	1149129	143002379	Chickasaw Tel. Co.	Telephone	\$922.80		80%	\$738.24	
387740	1149138	143025240	Cingular Wireless Inc.	Cellular Svcs	\$10,336.80		80%	\$8,269.44	
387740	1149141	143025240	Cingular Wireless Inc.	Cellular Svcs	\$2,399.04		80%	\$1,919.23	
387740	1149145	143019377	AirWaves Plus, Inc.	Paging Svcs	\$1,194.00		80%	\$955.20	
387740	1149150	143019377	AirWaves Plus, Inc.	Paging Svcs	\$2,677.80		80%	\$2,142.24	
387740	1149158	143015254	OneNet (Oklahoma State Reger	Internet Access	\$54,844.00		80%	\$43,875.20	
387740	1149164	143010484	Cable One, Inc	Internet Access	\$479.40		80%	\$383.52	
				Subtotal:		\$104,326.14		Subtotal:	\$83,460.91
387741	1153748	143026119	SK Shemor & Associates, LLC	Network Wiring	\$67,845.55		80%	\$54,276.44	
387741	1153754	143002379	Chickasaw Tel. Co.	Network Electronics	\$41,590.40		80%	\$33,272.32	
387741	1153768	143002379	Chickasaw Tel. Co.	Firewall	\$3,964.80		80%	\$3,171.84	
387741	1153771	143006043	ISC Computer Inc.	Network Mtc	\$9,600.00		80%	\$7,680.00	
387741	1153776	143017018	Arbuckle Communications, Inc.	PBX	\$43,716.20		80%	\$34,972.96	
387741	1153789	143002379	Chickasaw Tel. Co.	Router Mtc	\$548.80		80%	\$439.04	
387741	1153802	143002379	Chickasaw Tel. Co.	Router	\$31,181.40		80%	\$24,945.12	
387741	1153816	143004340	Dell Marketing LP	Server-DHCP	\$34,531.20		80%	\$27,624.96	
387741	1153826	143004340	Dell Marketing LP	Server Software	\$2,951.28		80%	\$2,361.02	
387741	1153831	143004340	Dell Marketing LP	Server Software	\$3,429.10		80%	\$2,743.28	
387741	1153840	143004812	SBC DataComm	Codec-Polycom	\$88,474.35		80%	\$70,779.48	
				Subtotal:		\$327,833.08		Subtotal:	\$262,266.46
				Total		\$432,159.22		Total:	\$345,727.37

ATTACHMENT #6

6-2

ATTACHMENT H

Letter of Agency

KELLOGG & SOVEREIGN CONSULTING, LLC

LETTER OF AGENCY

E-rate Program Years 2003(7/1/03-6/30/04) and 2004 (7/1/04-6/30/05)

I authorize Jane Kellogg, Don Kellogg, Debi Sovereign, and/or Tacy Olivo, representatives of Kellogg & Sovereign Consulting, LLC (formerly Kellogg Consulting, LLC), to submit the E-rate Forms 470, 471, 486, 500, 472 (BEAR form), and other forms requested by the Schools and Libraries Division of the USAC on behalf of our school system. We also authorize the aforementioned representatives to act as our agents in soliciting, receiving, and preparing comparisons of proposals from service providers.

Name of School: SOUTHERN OKLAHOMA TECHNOLOGY CENTER

As such, they are authorized to conduct the following on our behalf to:

- Prepare and submit all paperwork requested by the Schools and Libraries Division of the USAC (SLD)
- Act as our agent in working with representatives of SLD to resolve any questions or problems with applications
- Prepare Requests for Proposal (RFPs) to be posted to the Kellogg & Sovereign Consulting, LLC website and distributed to appropriate vendors
- Provide information to vendors as needed to clarify information in RFPs
- Receive bids for requested services from vendors
- Notify vendors of their selection to provide services once the authorized school contact has analyzed comparisons of bids submitted to us through Kellogg & Sovereign Consulting, LLC and we have notified Kellogg & Sovereign Consulting, LLC of our selections.
- Complete contracts as specifically directed by the authorized school contact person for eligible E-rate services

I also understand that in submitting these forms on our behalf, representatives of Kellogg & Sovereign Consulting are making certifications for our school system. By signing this letter of agency, I make the following certifications as required by the Schools and Libraries Division:

1. I recognize that support under this program is conditional upon the school(s) I represent (a) securing access to all of the resources, including computers, training, software, maintenance, and electrical connections necessary to use the services purchased effectively, and (b) securing funds to pay the school(s)' discounted charges for eligible services.
2. I certify that our school has an approved Technology Plan on file with the Oklahoma State Department of Education.
3. I certify that the school(s) eligible for support that I am representing have complied with all applicable state and local laws regarding procurement of services for which support is being sought.
4. I certify that the school's purchases at discounts provided by 47 U.S.C. Sec 254 will be used solely for educational purposes and will not be sold, resold, or transferred in consideration for money or any other thing of value.
5. I certify that the school(s) I represent will comply with all program rules, and I acknowledge that failure to do so may result in denial of discount funding and/or cancellation of funding commitments.
6. I understand that the discount level used for shared services is conditional, for future years, upon ensuring that the most disadvantaged schools and libraries that are treated as sharing in the service receive an appropriate share of benefits from those services.
7. I recognize that I may be audited pursuant to this school's application. I will retain for five years any and all worksheets and other records that are used in preparation of our school's E-rate application, and, if audited, will make available to the Administrator such records.

KELLOGG & SOVEREIGN CONSULTING, LLC

Letter of Agency-E-rate Program Year 6 (2003) & 7 (2004)

Page Two

8. I certify that the school(s) I represent has (have) complied with the requirements of the Children's Internet Protection Act, as codified at 47 U.S. C. Sec. 254(h) and (l).
9. I understand that persons willfully making false statements on the E-rate forms or through this Letter of Agency can be punished by fine or forfeiture under the Communications Act, 47 U.S.C. Secs. 502 and 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. Sec. 1001.
10. I certify that I am authorized to sign this letter of agency and to the best of my knowledge, information and belief, all information provided to Kellogg & Sovereign Consulting, LLC for the E-rate submission are true.

Signature of Authorized Person: CR Bob Gragg Date: 8-14-03
Printed Name of Authorized Person: C. R. BOB GRAGG Title: SUPERINTENDENT/CEO

PLEASE SIGN IN BLUE INK AND RETURN TO:
Kellogg & Sovereign Consulting, LLC, 902 Arlington Center, PMB 136,
Ada, OK 74820